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STIPULATION AND ORDER FOR PRELIMINARY INJUNCTION - 1 (C07-5171RBL)

HONORABLE RONALD B. LEIGHTON

07-CV-05171-ORD

FILED LODGED

APR 3 0 2007

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA
BY
DEPUTY

# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA

SCHWAN'S SALES ENTERPRISES, INC. (SSEI), a Minnesota Corporation; THE SCHWAN FOOD COMPANY, a Minnesota Corporation; and HOLIDAY FOODS, LLC, CAMDEN CULINARY, INC.,

Plaintiffs.

CHERYL GRANROTH,

٧.

Defendant.

Case No.: C07-5171RBL

STIPULATION AND ORDER FOR PRELIMINARY INJUNCTION

# **STIPULATION**

Defendant claims she has complied with this court's Order Granting Motion for Temporary Restraining Order and Other Relief. In compliance with the order, Defendant claims she has returned to Plaintiffs' counsel any and all documents and things, copies of documents, including electronic documents maintained in any recording medium, in her possession, custody, or control relating to Plaintiffs. In light of these circumstances, the parties stipulate to the entry of the following preliminary injunction and agree that the hearing scheduled for May 1, 2007, is unnecessary and should be canceled unless the Court determines that the hearing is necessary for issuance of the Order for Preliminary Injunction set forth below.

Jackson Lewis LLP
One Union Square
600 University Street, Suite 2900
Scattle, Washington 98101
(206) 405-0404

DATED this 27th day of April, 2007.

# JACKSON LEWIS LLP

By: /s/ Michael A. Griffin
Michael A. Griffin, WSBA #29103
Kurt J. Erickson, pro hac vice

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### **GRANT & ASSOCIATES**

By: /s/ Artis C. Grant

Artis C. Grant, Jr., WSBA #26204

3002 S 47th St.

Tacoma, WA 98409-4416 Telephone: (253) 472-6213

Fax: (253) 473-9695

Email: agrant@lawdome.com

Attorney for Defendant Cheryl Granroth

### ORDER FOR PRELIMINARY INJUNCTION

For the duration of this litigation, to the extent Defendant may have information that was copied and deleted from the company's laptop computer, Defendant is enjoined from disclosing any of Plaintiffs' confidential, proprietary, and trade secret information, specifically including without limitation all the information that was copied and deleted from the company laptop computer that Plaintiffs provided to Defendant.

Defendant is further ordered, to the extent she has not already, to return to Plaintiffs' counsel any and all documents and things, copies of documents, including electronic documents maintained in any recording medium, in her possession, custody, or control relating to Plaintiffs. This includes but is not limited to, all information and documents that were on the laptop computer Defendant used while working at Holiday Division/Camden Culinary.

Defendant is otherwise enjoined from violating the terms of her agreements with Plaintiffs.

The preliminary injunction hearing scheduled for May 1, 2007, is hereby canceled.

STIPULATION AND ORDER FOR PRELIMINARY INJUNCTION – 2 (C07-5171RBL)

Jackson Lewis LLP One Union Square 600 University Street, Suite 2900 Seattle, Washington 98101 (206) 405-0404

This 28th day of \_\_\_\_\_\_\_

, 2007.

UNITED STATES DISTRICT JUDGE

Ronald B. Leighton

STIPULATION AND ORDER FOR PRELIMINARY INJUNCTION – 3 (C07-5171RBL)

Jackson Lewis LLP One Union Square 600 University Street, Suite 2900 Scattle, Washington 98101 (206) 405-0404